

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

245 PARK MEMBER LLC,

Petitioner,

-against-

HNA GROUP (INTERNATIONAL)
COMPANY LIMITED,

Respondent.

Case No.: 1:22-cv-05136-JGK

**DECLARATION OF MARK P.
RESSLER**

I, Mark P. Ressler, declare pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner with the law firm Kasowitz Benson Torres LLP (“KBT”) and counsel to Petitioner 245 Park Member LLC in the above-captioned action.

2. I submit this declaration in support of Petitioner’s Memorandum of Law (the “Memorandum”) in Support of Motion by Order to Show Cause for (1) Prejudgment Attachment, (2) Temporary Restraining Order, and (3) Advance Notice of Asset Sales of Respondent HNA Group (International) Company Limited (the “Motion”). I have personal knowledge of the matters set forth in this declaration unless otherwise indicated, and would testify competently to the same if called upon as a witness.

3. Based on the Affidavit of Harrison Sitomer, sworn to on June 28, 2022 (the “Sitomer Aff.”) and attachments thereto, and as explained more fully in Petitioner’s Memorandum, good and sufficient reasons exist to proceed with this Motion by order to show cause. Respondent’s affiliates have attempted and are attempting to liquidate New York assets, which could be moved beyond the reach of this Court’s jurisdiction. Such conduct threatens to frustrate and undermine Petitioner’s ability to collect on the \$185 million judgment it seeks in

this action to confirm an arbitration award issued on May 5, 2022 by the Honorable L. Priscilla Hall (Ret.), JAMS arbitrator and former Associate Justice of the State of New York Appellate Division, Second Judicial Department, in favor Petitioner and against Respondent.

4. Attached hereto as **Exhibit A** is a true and correct copy of the Decision on Scheduling that Justice Hall issued in the JAMS arbitration on March 22, 2022.

5. No application for similar relief has been made.

6. On June 27, 2022, at 1:09 p.m., I notified Respondent's counsel by email that Petitioner would be filing the Motion the next day.

I declare under penalty of perjury that the above is true and correct, and that I executed this declaration this 28th day of June, 2022 in New York, New York.

/s/ Mark P. Ressler

Mark P. Ressler